UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

CHUN-KO CHANG, individually and on behalf of all others similarly situated,

Plaintiff,

v.

SHEN YUN PERFORMING ARTS, INC., FEI TIAN COLLEGE, FEI TIAN ACADEMY OF THE ARTS, DRAGON SPRINGS BUDDHIST INC., INTERNATIONAL BANK OF CHICAGO, SHUJIA GONG a/k/a TIANLIANG ZHANG, HONGZHI LI, and RUI LI,

Defendants.

Case No. 24-8980

Judge Philip M. Halpern

AFFIDAVIT

Times Wang, being duly sworn, hereby deposes and says as follows:

- 1. I am a partner with the law firm of Farra & Wang PLLC.
- 2. I submit this affidavit in support of my motion to appear *pro hac vice* in the above-captioned matter.
- 3. As shown in the attached certificates of good standing, I am a member in good standing of the bars of California, Colorado, and the District of Columbia.
- 4. There are no pending disciplinary proceedings against me in any state or federal court.
 - 5. I have never been convicted of a felony.
- 6. I have never been censured, suspended, disbarred, or denied admission or readmission by any court.

I declare under penalty of perjury and the laws of the United States that the foregoing is true and correct to the best of my knowledge.

Dated: June 9, 2025

Times Wang

NOTARIZATION

State of Colorado

County of Denver

Signed and affirmed before me on June 9, 2025 by Times Wang.

Signature

11-01-2026

Commission expiration

CHARLOTTE BOCQUIN SCULL STATE OF COLORADO NOTARY ID 20054039342 MY COMMISSION EXPIRES NOVEMBER 1, 2026